

Exhibit A

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Subject: [EXT] United States v. Menendez, et al., S4 23 Cr. 490 (SHS) -- proposed stipulation (Larry Lustberg)
Date: Friday, April 12, 2024 9:45:49 PM
Attachments: [2024.04.12 Lustberg stipulation - \(for circulation\).pdf](#)

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Attached is a stipulation concerning the testimony of Larry Lustberg (which, as you can see, does not preclude any party from moving to exclude any portion of the stipulation on grounds other than a hearsay objection to Lustberg not testifying). Annie Collart, representing Lustberg, has advised that Lustberg intends to sign it on behalf of Hana, but that he objects to certain portions of it being presented to the jury and is likely to seek to exclude them.

We should note that we, likewise, do not agree on the admissibility of all of the portions of this stipulation and may similarly seek to exclude certain of them. Should the stipulation be signed, we think it would make sense to confer on an orderly mechanism for narrowing and presenting all such outstanding disputes to the Court for resolution.

If you consent, please sign and return by the end of the day tomorrow so that, if the stipulation is not fully executed, we may inform the Court. Thank you very much.

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